

1 BRENDA M. HICKEY  
2 Cal Bar No. 261794  
3 Pier 9, Suite 100  
4 San Francisco, CA 94111-1497  
5 Telephone: (415) 494-8444  
6 Facsimile: (415) 735-3544  
7 Brendan@Defender-Services.com

8 Attorney for Defendant  
9 IDRIS SAFDARI

10  
11 IN THE UNITED STATES DISTRICT COURT  
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
13 SAN FRANCISCO DIVISION

14 UNITED STATES OF AMERICA,

15 Case No. CR-11-00500 SI

16 Plaintiff,

17 v.  
18 IDRIS SAFDARI,

19 Defendant.

20  
21 **STIPULATION AND [PROPOSED]**  
22 **ORDER AUTHORIZING TRAVEL AND**  
23 **TEMPORARY RETURN OF PASSPORT**

24 IT IS HEREBY STIPULATED by and between counsel for the parties, Assistant United  
25 States Attorney Tracie Brown for the United States, Brendan M. Hickey for Idriss Safdari that  
26 Mr. Idriss Safdari shall be permitted to travel from San Francisco to Afghanistan between April  
27 5<sup>th</sup> and April 17<sup>th</sup> for the purpose of assisting his sister in laying his recently-deceased brother-in-  
28 law to rest. Mr. Safdari is being supervised by United States Pretrial Services Officer Darryl  
Walker in the Eastern District of California, and he has agreed to the proposed travel.

29 Mr. Safdari shall provide a copy of his travel itinerary including flights and hotels to the  
30 pretrial service officer upon request. In order to permit this travel, Mr. Safdari shall have his  
31 passport returned forthwith, though he shall be required to surrender his passport again upon his  
32 return to the United States.

## SO STUPULATED,

DATED: April 5th, 2012

/s/ Brendan Hickey  
BRENDAN M. HICKEY  
Attorney for Mr. Safdari

DATED: April 5th, 2012

/s/ Tracie Brown  
TRACIE BROWN  
Assistant United States Attorney

## IT IS SO ORDERED

DATED:

S J

HONORABLE SUSAN ILLSTON  
United States District Court Judge